

# Exhibit “K”



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March 15, 2019

Ramon Z. Abueg  
Deputy Manager of Operations  
SFPUC, Power Enterprise  
525 Golden Avenue, 7<sup>th</sup> Floor  
San Francisco, CA 94102

Dear Mr. Abueg:

This letter responds to your March 11, 2019 letter. That letter related to the application submitted by the City and County of San Francisco, acting by and through its Public Utilities Commission (SFPUC), under the Wholesale Distribution Tariff (WDT) for wholesale distribution service for EVGo Charging Stations to be installed in the parking lot at 2685 Ocean Avenue, San Francisco.

Based on the SFPUC's description of the 600 kW EVGo Charging Station project, PG&E does not agree that it qualifies as a Muni Load. Therefore, the project must have appropriate intervening facilities in place before it is eligible for WDT service. PG&E recognizes that the SFPUC and PG&E disagree over the definition and scope of Muni Load, that the issue was the subject of a hearing at the Federal Energy Regulatory Commission (FERC), and that the parties are awaiting FERC's decision on the issue. Until that issue is finally decided, PG&E intends to continue to interpret Muni Load as it described in that FERC proceeding.

PG&E has previously advised the SFPUC that it is PG&E's position that primary service is appropriate for larger wholesale load interconnections and that primary service is also the appropriate service for utility-to-utility interconnections. PG&E has also previously explained to the SFPUC the circumstances under which variances from PG&E's standards may be appropriate. For greenfield projects, like the 2685 Ocean Avenue parking lot, PG&E has made clear to the SFPUC that it should be communicating to its customers in advance that the customer's project designs should incorporate the need to accommodate primary intervening facilities.

PG&E understands that the SFPUC does not agree with PG&E on this issue either, and that the SFPUC has initiated a complaint proceeding at FERC regarding primary vs. secondary service under the WDT. While that dispute is being resolved, PG&E suggests that the SFPUC promptly submit the required documentation for primary service to avoid delays in processing WDT applications where PG&E has advised the SFPUC that primary service is required.

Sincerely,

Yilma Hailemichael